

## **REMARKS**

### **The Office Action**

Claims 1-3 are pending in the application.

Claims 1, 3, 11 and 14 are independent claims.

Claims 1, 3, 11 and 14 stand rejected under 35 U.S.C. § 112, second paragraph.

Claims 1, 2, 7, 8, 11 and 12 stand rejected as being anticipated by Seni et al.

Claims 3-8 stand rejected as being unpatentable over Seni et al. in view of Microsoft Paint.

Claim 4 is apparently rejected under Seni et al. and Microsoft Word's Thesaurus.

Claims 5 and 9 stand rejected under a combination of Seni et al. and Wilcox et al.

Claims 14, 15, 17-20, 22 and 23 stand rejected under the combination of Seni et al. and Golovchinsky et al.

Claim 21 stands rejected under the combination of Seni et al. and Golovchinsky et al.

Claim 16 stands rejected under the combination of Seni et al., Golovchinsky et al. and Mahoney et al.

Claims 6, 10 and 13 were indicated to contain allowable subject matter.

### **The Claims are in Proper Form**

It was stated that claims 1, 3, 11 and 14 appear vague as to whom or what is the administrator of "automatically."

During the telephone interview of February 21, 2006, Applicants explained the automatic language was simply directed to, that in a computer process, the system is working in an automatic fashion, as opposed to intervention by a user. However, to address this issue, Applicants have removed this language.

### **Summary of Telephone Interview**

On February 21, 2006, Applicants and the Examiner held a telephone conference.

In particular, Applicants addressed the issue of claim 2 and Applicants' position

that this language is distinguished from Seni et al. Applicants explain that Seni et al. takes, for example, the handwritten word "happy" in Figure 1, and attempts to match this word to some sort of dictionary or directory using handwriting recognition software. For example, at step 146 of Figure 3 (see also, beginning in paragraph [0027], it is stated that once the handwritten entry is complete, a hand-recognition engine will match the handwritten input against words in the system dictionary, as supplemented by the user dictionary.

Therefore, Applicants explained that, unlike the present application as supported in claim 2 where the digital ink image is altered into multiple simultaneously existing structured alternative interpretations of the digital ink image, the digital ink image ("happy") of Seni et al. is never to multiple simultaneously existing structure alternative interpretations of itself altered. Rather, in Seni et al., "happy" in fact needs to be maintained and not altered, as it is used as the basis upon which comparisons are made by the handwriting recognition engine.

Unfortunately, agreement between the Examiner and Applicants could not be reached. However, Applicants respectfully maintain their position that the concepts of claim 2 distinguish from the cited art.

#### **Amendments to the Claims**

As an agreement could not be reached between Applicants and the Examiner regarding the language of claim 2, Applicants have incorporated the language used in other claims into the independent claims in an attempt to move the present prosecution forward.

More particularly, independent claim 1 is amended with the limitations of now-canceled claim 7.

Independent claim 3 is canceled.

Claim 11 has been amended to incorporate the noted-to-be allowable subject matter of claim 13, and its intervening claim, claim 12. Claims 12 and 13 have been canceled.

Independent claim 14 has been amended to include the limitations of now-canceled claims 15 and 16.

### **Independent Claim 1 is Now Distinguished**

In the most recent Office Action, claim 7 was rejected as being disclosed by Seni et al. (see page 6C of the Office Action). The following arguments were made:

The multiple structured object representations of the digital ink image are taught by the candidate words in display box 120.

At least a first image representation with a formal structured object representation is represented by the text at the top of the interface display 102 (*i.e.*, this is our new "UI.happy").

The second image representation which contains informal structured object representations is argued to be shown as the lower portion of the display designated as a handwriting input area of 104.

Initially, section 104 is not an area which contains informal structured object representations. Rather, this is the area where the digital ink image (*e.g.*, "happy") is input. There is no discussion in Seni et al. that what is in 104 are "informal structured object representations." It is rather the digital ink input area. Applicants respectfully submit at this point the rejection is using the same disclosure to teach both the digital ink input and the informal structured object representations of claim 7. However, it is respectfully submitted, there is no teaching anywhere in Seni et al. of the "informal structured object representations", alone and particularly which simultaneously co-exist with the formal structured object representations.

To further emphasize this distinction, Applicants respectfully request attention to Figures 3A-3G of the present application. Figure 3A may be considered the digital ink input. Then, as can be seen, for example, in Figure 3C, illustrated is an informal structured object representation. Particularly, as the inputted digital ink has been transformed to an informal structured object representation, the outer border can and is manipulated to be a dotted line. Then, for example, the formal structured object representation may be shown, for example, in Figure 3F. The other figures in 3A-3G are the multiple, simultaneously existing structured alternative interpretations of the digital ink image. It is submitted that nowhere in Seni et al. or the other cited references is there a fair teaching or disclosure of the inputted digital ink image (*i.e.*, in the

Examiner's example "happy"), being transformed into an informal structured objects. Particularly, simply writing in a digital ink format does not create an informal structured object representation as in the present application.

For this reason, claim 1, which now incorporates the subject matter of canceled claim 7 is distinguished.

**Independent Claim 11 is Distinguished From the Cited Art**

Claim 11 has been amended to incorporate the limitations of noted-to-be-allowable claim 13, and its intervening dependent claim 12. As the Examiner has indicated claim 13 contained allowable subject matter, it is submitted the proposed amendment places claim 11 in proper form.

**Independent Claim 14 is Distinguished**

Independent claim 14 has been amended to include the limitations of claim 15, directed to the structured object representations being informal structured object representations and formal structured object representations. Therefore, for the reasons discussed in connection with claim 1 (amended to include the concepts of claim 7), it is submitted claim 14 is distinguished for at least this reason.

Additionally, the concepts of now-canceled claim 16 have also been added to claim 14. The concepts of claim 16 include having the alternative interpretations permit a mixing of the formal structured object representations, and the informal structured object representations in a single image representation.

The Office Action discusses claim 16 and reasons for rejection on page 16.

In particular, in addition to Seni et al., the references Golovchinsky et al. and Mahoney et al. are further added. The Office Action admits the Seni et al. and Golovchinsky et al. references do not show the mixing of the formal structured object representations and the informal structured object representations in a single image representation. However, Mahoney et al. Figure 3, column 2, lines 45-49 are cited as teaching this concept. However, Applicants respectfully submit there is no teaching or fair suggestion that the handwritten portions (or even the text) are structured object representations editable by a structured text/graphics editor. Rather, Mahoney et al. is directed to spatial separations between clusters of objects in order to automatically

generate borders. It does not discuss creating formal structured object representations and informal structured object representations in a single image representation. The cited Figure 3 is not indicated as being structured objects. For at least these reasons, it is submitted claim 14 is distinguished.

**CONCLUSION**

Applicants respectfully request entry of these claim changes, so that the claims are in better form for examination and to accurately reflect Applicants' intentions.

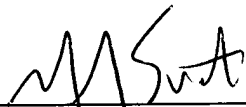
Applicants apologize for any inconvenience these omissions and/or errors may have caused.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark S. Svat, at Telephone Number (216) 861-5582.

Respectfully submitted,

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